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8 Attorneys for Defendants
9 PFIZER INC., PHARMACIA CORPORATION,
PHARMACIA & UPJOHN LLC, AND
10 PHARMACIA & UPJOHN COMPANY, LLC

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 CINDY WINWARD,
15 Plaintiff,

16 vs.

17 PFIZER INC., et al.,
18 Defendants.
19

Case No.: CV 07-00878 SBA

**STIPULATION AND ~~PROPOSED~~
ORDER RE EXTENSION OF ADR
DEADLINE**

Trial Date: 3/2/09

1 Plaintiff Cindy Winward and defendants Pfizer Inc., Pharmacia Corporation,
2 Pharmacia & Upjohn LLC, and Pharmacia & Upjohn Company LLC, hereby stipulate
3 to continue the date to hold an ADR session originally set for August 1, 2007 to
4 December 5, 2007. On May 5, 2007, the parties in this action filed a stipulation and
5 proposed order selecting an ADR Process in the form of private mediation with a
6 deadline of August 1, 2007. In support of this stipulation to continue the date of the
7 mediation to December 5, 2007, the parties hereby state as follows:

8 1. On April 10, 2007 plaintiff submitted a motion to the United States
9 Judicial Panel on Multidistrict Litigation ("JPML") to consolidate this case with
10 Riddell v. Pfizer, et al., a class action pending in the District of New Jersey.
11 Opposition to this motion was filed by defendants on May 5, 2007. Oral argument on
12 the motion has been scheduled for July 26, 2007. See Declaration of Ann Marie
13 Mortimer ¶ 2, Exhibit "A."

14 2. On June 8, 2007, plaintiff filed a motion to consolidate this action with
15 Cable v. Pfizer Inc., et al., CV 07-00879 SBA. On June 26, 2007, defendants filed an
16 opposition to plaintiff's motion to consolidate concurrently with a cross-motion to
17 transfer this matter to the District of Utah pursuant to 28 U.S.C. § 1404(a). Hearing
18 on plaintiff's motion to consolidate and defendants' cross-motion to transfer is
19 currently scheduled for October 23, 2007.

20 3. Due to the motion to consolidate pending with the JPML and plaintiff's
21 motion to consolidate and defendants' cross-motion to transfer pending in the
22 Northern District, an August 1, 2007 ADR deadline is premature.

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2 4. The parties respectfully request the Court to enter the Proposed Order for
3 the reasons set forth above.
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5 Respectfully submitted,

6 Case 4:07-cv-00878-SBA Document 34 Filed 07/13/2007 Page 3 of 3

7 DATED: July 11, 2007

HUNTON & WILLIAMS LLP

8
9 By: 

10 Ann Marie Mortimer
11 Attorneys for Defendants
12 PFIZER INC., PHARMACIA
13 CORPORATION, PHARMACIA &
14 UPJOHN LLC, AND PHARMACIA &
15 UPJOHN COMPANY, LLC

16 Dated: July 11, 2007

STERNS & WALKER

17 By: 

18 Brenda Posada
19 Attorneys for Plaintiff,
20 CINDY WINWARD

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.
22

23 Dated: July 16, 2007

24 By: 

25 Sandra B. Armstrong
26 UNITED STATES DISTRICT JUDGE
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